

## REMARKS

Claims 1-4 were examined. All claims were rejected. In response to the above-identified Final Office Action, Applicants amend claims 1-4 and add new claims 5-10. Reconsideration of the rejected claims in light of the aforementioned amendments and the following remarks is requested.

### **I. Claims Rejected Under 35 U.S.C. § 103(a)**

The Examiner rejected claims 1-4 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,085,098 issued to Moon ("*Moon*") in view of U.S. Patent No. 5,523,754 issued to Eisen *et al.* ("*Eisen*"). Applicants believe that the present invention is definitely different from these references for at least the reasons discussed below.

As to claim 1, that claim recites a method for providing a mobile terminal with a software keyboard proper for the language of a country where it is located in a mobile communications network providing global roaming from a server through a mobile communication channel, comprising a number of steps, including transmitting location information of the mobile terminal to the server and transmitting information about a proper software keyboard based on the location information to the mobile terminal. These features, at least, are absent from the references of record.

*Moon* does use geographical location information in a portable intelligent communications device, but the use is entirely *within* the device itself: a software application which needs the location information to configure itself (*e.g.* a calculator software application including a currency converter or a clock application with a dual time zone feature) requests the information from the top layer of system operating software. (*See* col. 5, lines 36-38 and col. 4, lines 25-28). The device obtains the location information through one of a number of means and returns it to the application, which configures itself accordingly. The information is not transmitted to a server, but is instead produced and consumed locally.

Of course, *Moon* does not discuss the selection or use of a proper software keyboard at all. For this information, the Examiner relies on *Eisen*. However, that supplemental reference is also deficient because it is concerned with switching from one keyboard mapping to another based on the application being used in a computer

system (*see* col. 3, lines 44-48). The mapping does not depend on any location information, and furthermore it is not sent to the computer system from a server through a mobile communication channel, as claim 1 requires.

Thus, even assuming for the sake of argument that *Moon* and *Eisen* properly may be combined, they fail to teach or suggest at least the elements of claim 1 discussed above. For at least the reasons mentioned, Applicants submit that claim 1 is patentable over the references of record, and request that the Examiner withdraw the rejection of that claim.

As to claim 2, that claim supplements the method of claim 1 to include the step of if a predetermined software keyboard is requested from the server, transmitting information about the predetermined software keyboard to the mobile terminal instead of the proper software keyboard determined based on the location information. Although *Eisen* mentions allowing the user to request a change of keyboard mapping for an application, the keyboard map is not transmitted from a server, but instead is merely selected from a pull-down menu or other appropriate method. Clearly, the keyboard map must be stored locally, and not in a database of information corresponding to multinational software keyboards in the server, as claim 2 requires (because of its dependence on claim 1). Furthermore, all the reasons discussed in support of claim 1 also apply to the rejection of claim 2, since claim 2 depends on claim 1. For at least these reasons, Applicants request that the Examiner withdraw the rejection of claim 2.

As to claim 3, that claim refines the method of claim 2 to include a step of canceling the transmission of information about a proper software keyboard based on the location information or rejecting the proper software keyboard. No such transmission occurs in *Moon* or *Eisen*, so of course it cannot be canceled. The references also fail to teach rejecting a proper software keyboard. In addition, claim 3 depends upon claim 2 and ultimately upon claim 1, so all the reasons discussed in support of those base claims also apply to claim 3. For at least those reasons, Applicants respectfully request that the rejection of claim 3 be withdrawn.

As to claim 4, that claim recites a recording medium programmed by a computer to perform a method for providing a mobile terminal with a software keyboard proper for the language of a country where it is located in a mobile communications network, comprising a number of steps including transmitting location information of the mobile

terminal to the server, and transmitting information about a proper software keyboard based on the location information to the mobile terminal from the server through the mobile communication channel. However, the limitations just mentioned are identical to those discussed previously in relation to claim 1. The same reasons apply to claim 4 as well: these limitations are simply not taught or suggested by the references of record, so the rejection of claim 4 should be withdrawn.

More generally, Applicants note that the present invention relates to a mobile communication network. Referring to lines 8 to 15 on p. 4, a mobile terminal according to the present invention receives the location information through the base station and the mobile communication network. However, *Eisen* discloses a local area network (LAN) system for setting a predetermined software application in response to a certain geographical location information. The local area network (LAN) system is absolutely different from the mobile communication network according to the present invention.

Also, the mobile terminal in accordance with the present invention does not need to store all the multinational software keyboards. In the present invention, the mobile terminal requests a predetermined software keyboard based on the location information, from the server of the mobile communication system. In contrast, *Moon* discloses an apparatus for automatically configuring settings for a software application in response to the location information, but *Moon's* apparatus already contains the predetermined software information it needs, and only resets or adjusts the configuration whenever the location information is changed. In other words, the apparatus according to *Moon* does not receive further information from the server in response to a user's request.

As this general discussion shows, the present invention is definitely different from the references of record. Therefore, Applicants believe that claims 1-4, as amended, are now patentable over the cited references.

## **II. New Claims**

Applicants have also added new claims 5-10 in order to particularly point out and distinctly claim the subject matter of the present invention. It is believed that the new claims are fully supported and do not add new subject matter.

Furthermore, the new independent claims 5 and 8 incorporate limitations similar to those already discussed in relation to claims 1 and 4, namely means for transmitting a location of the mobile terminal to the server, and means for transmitting a proper

software keyboard based on the location information to the mobile terminal from the server through the mobile communication channel. As previously mentioned, neither *Moon* nor *Eisen* teaches or suggests these elements, and so Applicants believe the new claims are also allowable over the references of record, and respectfully request favorable consideration from the Examiner.



CONCLUSION

In view of the foregoing, it is believed that all claims now pending, namely claims 1-10, patentably define the subject invention over the prior art of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207-3800.

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Respectfully submitted,  
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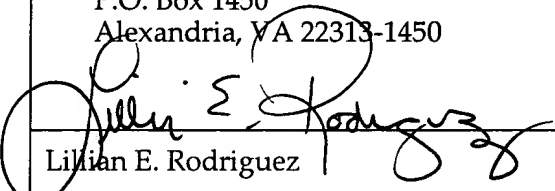
  
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